

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
KNOXVILLE DIVISION**

ISABEL ZELAYA, et al.,

Plaintiffs,

V.

ROBERT HAMMER, et al.,

Defendants.

No.: 3:19-cv-00062-PLR-HBG

**INTERROGATORIES AND REQUESTS FOR PRODUCTION PROPOUNDED TO THE
PLAINTIFF GERONIMO GUERRERO**

Pursuant to the Federal Rules of Civil Procedure, Defendant John Witsell (“Agent Witsell”), in his individual capacity, propounds the following interrogatories and requests for production to the Plaintiff Geronimo Guerrero:

INTERROGATORIES

INTERROGATORY NO. 1: Please state your legal name, address, phone number, place of birth, date of birth, social security number, and/or federal tax I.D. number.

RESPONSE:

INTERROGATORY NO. 2: Please state (a) the date you came to the United States of America; (b) every name you have used since you came to the United States of America; (c) the first date you were authorized to work in the United States of America and by what authority; (d) the date you came to Tennessee; (e) the date you went to work at Southeastern Provisions, LLC’s meat packing plant in Bean Station, Tennessee (the “Plant”); and (f) a description of your job duties at the Plant on April 5, 2018.

RESPONSE:

INTERROGATORY NO. 3: Were you authorized to work in the United States of America on April 5, 2018. If your answer is yes, please state by what authority.

RESPONSE:

INTERROGATORY NO. 4: Please state (a) the name, address, phone number of the person(s) to whom you were talking on the cell phone on April 5, 2018 when you encountered Agent Witsell at the Plant, (b) the phone number of the cell phone you were calling from, and (c) the name of the provider of the cell phone you were calling from.

RESPONSE:

INTERROGATORY NO. 5: Were you injured during your encounter with Agent Witsell on April 5, 2018? If so, please describe in detail the injuries you claim you received from your encounter with Agent Witsell on April 5, 2018.

RESPONSE:

INTERROGATORY NO. 6: Please state the full names and addresses of any doctors, nurse practitioners, physicians' assistants or other medical providers who have treated or examined you at any time for any injuries you claim you received from your encounter with Agent Witsell on April 5, 2018.

RESPONSE:

INTERROGATORY NO. 7: If you received hospital treatment for the injuries described in Interrogatory Number 5, please state the name of each such hospital providing treatment, and the dates of admission and discharge.

RESPONSE:

INTERROGATORY NO. 8: Please itemize your financial losses you attribute to your encounter with Agent Witsell on April 5, 2018, including (without limitation) any medical bills, lost wages, or other losses you claim to have sustained.

RESPONSE:

INTERROGATORY NO. 9: Please list every employer for whom you have worked since April 5, 2018. For each employer identified in response to this Interrogatory, please state the name, address, phone number, date of hire, date of termination, reason for termination, job duties, and salary or rate of pay.

RESPONSE:

INTERROGATORY NO. 10: Please identify by name, address, and telephone number all persons, including witnesses, who have knowledge or information as to your encounter with Agent Witsell.

RESPONSE:

INTERROGATORY NO. 11: Please identify by name, address, and telephone number each person whom you expect to call as an expert witness at the trial of this cause; state the

subject matter on which the expert is expected to testify; the substance of the facts and opinions to which the expert is expected to testify; and, a summary of the grounds for each opinion.

RESPONSE:

INTERROGATORY NO. 12: When you worked at the Plant, were you paid in cash or by check?

RESPONSE:

REQUESTS FOR PRODUCTION

Definitions:

With respect to the Requests for Production, the words “You” and “Your” mean you and your attorneys. If you and/or your attorneys claim privilege or attorney work product, please produce a privilege and/or work product log.

With respect to the Requests for Production, the word “document” includes photographs, videos, audio recordings, texts, emails, written communications of any type including social media, calendars, writings of any kind, permits, visas, licenses, passports, I.D.’s, memos, memorandum, notes, notations.

REQUEST NO. 1: Please produce a copy of each medical bill that you claim is related to the treatment of injuries arising out of your encounter with Agent Witsell on April 5, 2018.

RESPONSE:

REQUEST NO. 2: Please produce copies of any bills or listings of any other losses or other out-of-pocket expenses you claim are causally related to your encounter with Agent Witsell.

RESPONSE:

REQUEST NO. 3: Please produce a copy of your income tax returns for the years 2016, 2017, 2018, 2019, 2020.

RESPONSE:

REQUEST NO. 4: Please produce the document(s) that authorized you to work in the United States of America on April 5, 2018.

RESPONSE:

REQUEST NO. 5: Please produce the document(s) that appeared to authorize you to work in the United States of America on April 5, 2018.

RESPONSE:

REQUEST NO. 6: Please produce a copy of any and all documents of all statements made by any witness in your possession regarding your encounter with Agent Witsell.

RESPONSE:

REQUEST NO. 7: Please produce all photographs, videos, and audio recordings you took on April 5, 2018 inside the Plant, outside the Plant, on any transportation transporting you

away from the Plant, and/or at any other location where you were transported by the government on April 5, 2018, including but not limited to the Armory referenced in your Complaint.

RESPONSE:

REQUEST NO. 8: Please produce all photographs, videos, audio recordings in your possession that were taken on April 5, 2018 inside the Plant, outside the Plant, on any transportation transporting you away from the Plant, and/or at any other location where you were transported by the government on April 5, 2018, including but not limited to the Armory referenced in your Complaint.

RESPONSE:

REQUEST NO. 9: Please produce all photographs, videos, audio recordings of your injuries sustained as a result of your encounter with Agent Witsell on April 5, 2018.

RESPONSE:

REQUEST NO. 10: Please produce all documents in your possession regarding your encounter with Agent Witsell on April 5, 2018.

RESPONSE:

REQUEST NO. 11: Please produce all documents in your possession regarding any of the events of April 5, 2018.

RESPONSE:

REQUEST NO. 12: Please produce a copy of your driver's license.

RESPONSE:

REQUEST NO. 13: To the extent not produced in response to the previous request, please produce a copy of all photo IDs that you currently use.

RESPONSE:

REQUEST NO. 14: To the extent not produced in response to the preceding requests, please produce a copy of all photo IDs that you have used on, before, or after your encounter with Agent Witsell on April 5, 2018.

RESPONSE:

REQUEST NO. 15: Please produce a copy of your green card, work permit, work visa, visa, H-1B visa, or any other kind of document that authorizes you or appears to authorize you to be in the United States of America and/or to work in the United States of America.

RESPONSE:


Mary Ann Stackhouse, Esq. (BPR #017210)

LEWIS THOMASON, P.C.
One Centre Square, Fifth Floor
620 Market Street
P.O. Box 2425
Knoxville, TN 37901
(865) 546-4646

*Attorneys for Defendant John Witsell,
In his Individual Capacity*

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document has been served on the following counsel of record in the manner of service indicated below:

☒ By email to:

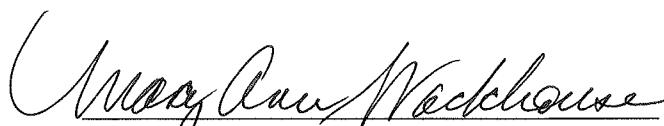
Kenny.Saffles@usdoj.gov
leah.mcclanahan@usdoj.gov
martinez-olguin@nilc.org
art.bookout@probonolaw.com
eben.colby@probonolaw.com
jeremy.berman@probonolaw.com
iulia.solorzano@splcenter.org
lapointe@nilc.org
norma.ventura@splcenter.org
meredith.stewart@splcenter.org
pcramer@sherrardroe.com
jfarringer@srvhlaw.com
bharbison@srvhlaw.com

☐ By placing document in third party express delivery carrier, i.e., Federal Express, for overnight delivery to the following counsel of record:

☐ By sending document via facsimile to:

☐ By causing the foregoing to be hand delivered to counsel of record at the following address on this _____ day of _____, 2021.

This the 9th day of March, 2021.


Mary Ann Stackhouse, Esq. (BPR #017210)